

### **REMARKS**

Claims 1-18 are currently pending in the patent application. The Examiner has rejected the Claims 13-14 under 35 USC 112 as not supported by the Specification. Applicants have amended the Specification to include the program storage device, which finds support in the original Claims 13-14. The Examiner has rejected Claims 1-18 under 35 USC 102(e) as anticipated by Sinai. For the reasons set forth below, Applicants respectfully assert that all of the pending claims are definite and patentable over the cited prior art.

The present application teaches and claims a system for a user interacting with a web site to automatically create a voice XML file. The system includes a graphic user interface for defining a multiple of icons, wherein each of the icons corresponds to one or more attributes of voice XML; a voice XML tag generator for interpreting the action stream of a user based on a library of voice XML tags and generating the corresponding voice XML tags; and a voice XML file generator 103 for combining the contents to be played with the tags generated by the voice XML tag generator

according to voice XML syntax for creating the voice XML file. Under the present invention, the user is dynamically creating a voice file to interact with a web site.

The Sinai patent is directed to a developer creating a file that a user can access on a web page in order to "interact" with the web page. The developer graphically defines a dialog as a sequence of speech objects in order to "pre-record" voice files that can be played to a user. While the Sinai system may be accessed by a user, there is nothing in Sinai which teaches or suggests that the web site user can dynamically create a voice file to interact with the web site. Sinai simply lets the user playback the prestored dialogs created by the developer.

In contrast, the present invention allows the user to dynamically create voice XML files by providing a graphic user interface for defining a plurality of icons, each of said icons corresponding to one or more attributes of voice XML; receiving user selection input of said icons; recording an action stream of a user invoking said icons in the graphic user interface; and interpreting said action stream based on a library of voice XML tags to create the voice XML file (Claims 1, 7 and 13). Clearly Sinai is not teaching or suggesting such a graphical user interface component or

functionality. Further, there is nothing in the Sinai patent which teaches or suggests the steps and means for automatically adding one or more audio hyperlinks for a voice file (Claims 2-6, 8-12 and 14-18).

For a patent to anticipate another invention under 35 USC § 102(e), the patent must clearly teach each and every claimed feature of the anticipated invention. Since the Sinai patent clearly does not teach the features of the system, method or program storage device as claimed, namely the steps and means for providing a graphic user interface for defining a plurality of icons; receiving user selection input of the icons; recording an action stream of a user invoking the icons in the graphic user interface; and interpreting the action stream to dynamically create a user voice XML file, it cannot be maintained that the Sinai patent anticipates each and every claim feature of the independent claims, Claims 1, 7 and 13, or of the remaining claims which depend therefrom and add further limitations thereto.

Based on the foregoing amendments and remarks,  
Applicants respectfully request entry of the amendments,  
reconsideration and withdrawal of the rejections of the  
claims as anticipated by Sinai, and issuance of the claims.

Respectfully submitted,

J. T. C. Yeh, et al

By: /Anne Vachon Dougherty/  
Anne Vachon Dougherty  
Registration No. 30,374  
Tel. (914) 962-5910